

1 ADAM PAUL LAXALT
2 Attorney General
3 Clark G. Leslie (Bar. No. 10124)
Chief Deputy Attorney General
4 Theresa M. Haar (Bar. No. 12158)
Deputy Attorney General
State of Nevada
Office of the Attorney General
5 555 E. Washington Ave., Ste. 3900
Las Vegas, NV 89101
(702) 486-3792 (phone)
(702) 486-3773 (fax)
thaar@ag.nv.gov

8 Attorneys for Defendants
James "Greg" Cox, Timothy Filson,
9 Dwight Neven, and Ronald Oliver

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 VICTOR PEREZ, as Special
Administrator of the Estate of CARLOS
13 PEREZ, deceased; VICTOR PEREZ, as
Guardian Ad Litem for S.E.P., a minor;
14 VICTOR PEREZ, as Guardian Ad Litem
for A.I.P., a minor,

15 Plaintiffs,

16 vs.

17 STATE OF NEVADA, ex rel. NEVADA
18 DEPARTMENT OF CORRECTIONS;
DIRECTOR GREG COX, individually;
WARDEN DWIGHT NEVEN,
19 individually; ASSISTANT WARDEN
TIMOTHY FILSON, individually; COT.
RAMOS, individually; LIEUTENANT
OLIVER, individually; CORRECTIONS
21 OFFICER CASTRO, individually;
CORRECTIONS OFFICER SMITH,
individually; and DOES I-X, inclusive; and
22 ROES I-X, inclusive,

24 Defendants.

CASE NO. 2:15-cv-01572-APG-CWH

25
**STIPULATION AND ORDER
TO EXTEND TIME
(First Request)**

26 Plaintiffs, Victor Perez, as Special Administrator of the Estate of Carlos Perez,
27 deceased; Victor Perez, as Guardian Ad Litem for S.E.P., a minor; and Victor Perez, as
28 Guardian Ad Litem for A.I.P., a minor, by and through counsel Cal Potter; Defendants

1 State of Nevada ex rel. Nevada Department of Corrections, James Greg Cox, Timothy
2 Filson, Dwight Neven, and Ronald Oliver, by and through counsel, Adam Paul Laxalt,
3 Attorney General of the State of Nevada, and Theresa M. Haar, Deputy Attorney
4 General; Defendant Isaiah Smith, by and through counsel Jeffrey Barr; Defendant Jeff
5 Castro, by and through counsel Craig Anderson; and Defendant Raynaldo-John Ramos,
6 by and through counsel, Robert Freeman, hereby stipulate as follows:

7 On September 29, 2016, a telephonic status conference was held. See ECF No. 74.
8 It was determined that if the matter does not settle at the upcoming status conference,
9 Plaintiffs will have two weeks to file their Amended Complaint. *Id.* On October 3, 2016,
10 Plaintiffs filed their Amended Complaint. ECF No. 75. All parties hereby stipulate that
11 Defendants will have two weeks from the date of the Settlement Conference to Answer or
12 otherwise respond to Plaintiff's Amended Complaint.

13 The parties here state that there is good cause for the extension. The parties are
14 scheduling a Settlement Conference in an attempt to resolve this matter, and believe it
15 would conserve judicial resources to extend the time for Defendants to respond to
16 Plaintiff's Amended Complaint. The parties have met and conferred on the matter, and
17
18
19
20
21
22
23
24
25
26 . . .
27 . . .
28 . . .

1 stipulate to extend the time to respond to Plaintiff's Amended Complaint until two weeks
2 after the conclusion of the Settlement Conference.

3 Dated: October 20, 2016

4 POTTER LAW OFFICES

5
6 /s/ C. J. Potter, IV
7 Cal J. Potter, III, Esq.
C. J. Potter, IV, Esq.
Attorneys for Plaintiffs

8
9
10 Dated: October 20, 2016

11 LEWIS, BRISBOIS, BISGAARD,
& SMITH, LLP

12
13 /s/ Robert W. Freeman
14 Robert W. Freeman, Esq.
Attorneys for Defendant
Raynaldo-John Ramos

15
16 Dated: October 20, 2016

17 MARQUIS AURBACH COFFING

18
19 /s/ Craig S. Anderson
20 Craig S. Anderson, Esq.
Attorney for Defendant
Jeff Castro

21
22
23 IT IS SO ORDERED.

24 Dated this 21st day of October, 2016.

25
26
27
28 Dated: October 20, 2016

ADAM PAUL LAXALT
Nevada Attorney General

/s/ Theresa M. Haar
Clark G. Leslie
Chief Deputy Attorney General
Theresa M. Haar
Deputy Attorney General
Attorneys for Defendants
Cox, Filson, Neven, and Oliver

Dated: October 20, 2016

ASHCROFT & BARR

/s/ Jeffrey F. Barr
Jeffrey F. Barr, Esq.
Attorneys for Defendant
Isaiah Smith

UNITED STATES MAGISTRATE JUDGE